Case 2:17-cv-01590-UJB-LSC Document 1-1 Filed 09/15/17 Page 1 of 3

2017 Sep-18 AM 10:06 U.S. DISTRICT COURT N.D. OF ALABAMA

EXHIBIT 1



714-32nd Street, South Office: 205.224.4463

Birmingham, Alabama 35233 Fax: 888.202.1996

May 12, 2017

Claims Management Inc. Attn: Brittiny Hardiman P. O. Box 14731 Lexington, KY 40512

RE: SETTLEMENT OFFER

My Client:

Patricia Bolden

Date of Loss

12/22/2016

Store Number:

8247

File Number:

7956309

Dear Ms. Hardiman

This letter is in response to an incident that occurred on December 22, 2016. Ms. Bolden slipped in full in an unknown substance at Sams Wholesale. Ms. Bolden is a sixty-four old mother. She is employed with the Pearson Hall Alcohol and Drug Center and Children's Hospital. She suffered injuries to her neck, left ankle, left foot, left knee, left shoulder, upper and lower back. She also suffered from muscle spasms. Her injuries required spinal block to control the pain and spasms. She continues to suffer from the injuries she sustained due to this accident.

PAST AND FUTURE PAIN AND SUFFERING LIMITATION OF ACTIVITIES

Since this accident, she has endured extreme discomfort, pain, suffering, and mental anguish. Her injuries have reduced her to discomfort and inconvenience. She continues to experience the adverse effects of the injury. She will require additional blocks to control the back pain and spasms. A complete description of the adverse effects of this incident is beyond the scope of this letter and beyond an accurate monetary amount. For purposes of resolving this matter, we attempt to assign a monetary amount to those injuries and losses.

Medical Expenses	S	11.924.50
VIIICAGO,	S.	162.40
LOSS Wages		12.276.00
Past/Future Pain and Suffering	\$	75,000.00
TOTAL DAMAGES ASSESSED	\$	100,300.90
CONCLUSION		

On behalf of my client, based on the information provided, we hereby offer to settle the claim for the sum One Hundred Thousand Three Hundred Dollars as settlement of the claims set forth. Considering the nature of the injuries, losses incurred, pain and discomfort she will endure the rest of their lives, we feel the offer is reasonable. I make this offer in good faith with hopes of resolving this matter before trial.

I look forward to a prompt resolution of this matter. I request a response within (10) days of the date of this letter.

Rojessa L. Passell Attorney at Law

714 32nd Street South

Birmingham, Alabama 35233

(205) 224-4463 (205) 222-1192